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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12 HOPE HILL,

13 Plaintiff,

14 v.

15 UNITED STATES OF AMERICA, et al.,

16 Defendants.
17

Case No. 17-cv-03841 JST

**STIPULATION TO EXTEND THE
STAY OF ALL PROCEEDINGS;
~~PROPOSED~~ ORDER**

18 IT IS HEREBY STIPULATED by and between the Plaintiff, Hope Hill, and Defendants, United
19 States of America, et al., through counsel, that good cause exists for, and the parties request that, the
20 Court extend the stay of all proceedings and continue the case management conference and all related
21 deadlines until May 22, 2019.

22 The above request is based in part on the following:

23 1. This is a civil action to determine Plaintiff's U.S. citizenship and the issuance of a U.S.
24 Passport based on application for a passport.

25 2. This is the parties' third request to stay all proceedings pending their attempts to resolve
26 this case without further litigation. During this time, the plaintiff filed a new passport application with
27 the U.S. Passport Agency
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3. On November 2, 2018, the Plaintiff and her immediate family had an in-person appointment with the passport officials in the San Francisco Passport Agency concerning the Plaintiff's passport application. The Plaintiff anticipates that she may be asked for supplemental and follow up information by the Passport Agency for its consideration of the Plaintiff's passport application.

4. The Plaintiff's passport application is still pending before the U.S. Passport Agency, and the parties would like additional time to permit this application process to be completed because if successful, it will moot Plaintiff's complaint and save valuable time and resources of this Court.

Therefore, the parties request that the Court extend the stay of all proceedings and continue the case management conference and all related deadlines until May 22, 2019.

IT IS SO STIPULATED.

Respectfully submitted,

ALEX G. TSE
United States Attorney

Dated: December 27, 2018

By: /s/ Douglas K. Chang
DOUGLAS K. CHANG
Assistant United States Attorney
Attorneys for Defendants

ORD & NORMAN

Dated: December 27, 2018

By: /s/ Cheng Zhang*
EDWARD O.C. ORD, Esq.
CHENG ZHANG, Esq.
Attorneys for Plaintiff

* I hereby attest that I have obtained the concurrence in the filing of this document from Cheng Zhang.

/s/ Douglas K, Chang
Douglas K. Chang

1 **~~PROPOSED~~ ORDER**

2 Having considered the stipulation of the parties, the Court orders as follows:

3 The Court grants the parties' stipulation to extend the stay of all proceedings pending their
4 continued attempts to resolve this case without further litigation. ECF No. 29.

5 The initial case management conference is continued to May 22, 2019, at 2:00 p.m., with a joint
6 case management statement due by May 13, 2019. Any party seeking the Court's assistance before that
7 date may contact the Court's courtroom deputy to request an earlier case management conference.
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9 If the parties reach an amicable resolution, they shall promptly file a stipulation of dismissal. If
10 no party appears on May 22, 2019, and the matter has not already been dismissed, the Court will then
11 dismiss the action with prejudice.

12 IT IS SO ORDERED.

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14 Dated: December 28, 2018

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16 JON S. TIGAR
17 United States District Judge
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